

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT  
SYSTEMS ANTITRUST LITIGATION

MDL No. 2817  
Case No. 18-cv-00864

This Document Relates To:

Hon. Robert M. Dow, Jr.  
Magistrate Judge Jeffrey T. Gilbert

*Loop, LLC d/b/a AutoLoop v. CDK Global,  
LLC*, Case No. 1:18-cv-002521 (N.D. Ill.)

**DECLARATION OF DANIEL V. DORRIS IN SUPPORT OF  
PLAINTIFF AUTOLOOP'S MOTION FOR SUMMARY JUDGMENT  
ON CDK GLOBAL, LLC'S COUNTERCLAIM**

I, Daniel V. Dorris, pursuant to 28 U.S.C. § 1746, declare as follows: I am a partner with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. in Washington, D.C. I respectfully submit this declaration in support of Plaintiff AutoLoop's Motion for Summary Judgment on CDK Global, LLC's Counterclaim. All of the documents attached to this Declaration and identified below (Exhibits 1 – 17), are true and correct copies of the identified documents and have been designated, as appropriate, under the Second Amended Agreed Confidentiality Order in this case (Dkt. 650).

1. Attached as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the June 27, 2017 (Day 2 Morning Session) Preliminary Injunction Hearing in *Authenticom, Inc. v. CDK Global, LLC*, No. 17-318 (W.D. Wis.), Dkt. 165 ("PI Hearing Tr. 2-A").

2. Attached as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the November 28, 2018 deposition of Anthony Petruzelli in this litigation.

3. Attached as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the November 30, 2018 deposition of Keith Jezek in this litigation.

4. Attached as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the December 11, 2018 deposition of Matthew Rodeghero in this litigation.

5. Attached as **Exhibit 5** is a true and correct copy of excerpts from the transcript of the January 25, 2019 deposition of Ronald Lamb in this litigation.

6. Attached as **Exhibit 6** is a true and correct copy of excerpts from the transcript of the February 8, 2019 deposition of Paul Whitworth in this litigation.

7. Attached as **Exhibit 7** is a true and correct copy of excerpts from the transcript of the April 11, 2019 Rule 30(b)(6) deposition of Matthew Rodeghero in this litigation.

8. Attached as **Exhibit 8** is a true and correct copy of excerpts from the transcript of the April 25, 2019 Rule 30(b)(6) deposition of Brian Green in this litigation.

9. Attached as **Exhibit 9** is a true and correct copy of excerpts from the transcript of the April 26, 2019 Rule 30(b)(6) deposition of Paul Whitworth in this litigation.

10. Attached as **Exhibit 10** is a true and correct copy of the Highly Confidential Expert Report of Mark A. Israel, Ph.D. dated August 26, 2019.

11. Attached as **Exhibit 11** is a true and correct copy of a document as produced by Plaintiff AutoLoop in this litigation with the beginning Bates number of AL\_MDL\_0006233.

12. Attached as **Exhibit 12** is a true and correct copy of a document as produced by Defendant The Reynolds and Reynolds Company in this litigation with the beginning Bates number of REYMDL00017999.

13. Attached as **Exhibit 13** is a true and correct copy of a deposition exhibit marked in this litigation as DX122 with the beginning Bates number of AL\_MDL\_0041051.

14. Attached as **Exhibit 14** is a true and correct copy of a deposition exhibit marked in this litigation as DX200 with the beginning Bates number of AUTOLOOP\_FTC\_0003476.

15. Attached as **Exhibit 15** is a true and correct copy of a deposition exhibit marked in this litigation as DX368 with the beginning Bates number of AL\_MDL\_0026550.

16. Attached as **Exhibit 16** is a true and correct copy of a deposition exhibit marked in this litigation as PX443 with the beginning Bates number of CDK-0244309.

17. Attached as **Exhibit 17** is a true and correct copy of a deposition exhibit marked in this litigation as PX675 with the beginning Bates number of REYMDL00199541.

18. Attached as **Exhibit 18** is a true and correct copy of the Declaration of Mark Israel, dated May 19, 2020.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 20, 2020

/s/ Daniel V. Dorris  
Daniel V. Dorris